

REMARKS

Claims 1-4, 6, 8-12, 14, 16-20, 22-23, 25-30, 32-33, 36-44, 46, 48-56, and 58 remain in this application. Claims 5, 7, 13, 15, 21, 24, 31, 34-35, 45, 47, 57, and 59 have been cancelled. Claims 1, 8-9, 16-17, 25-27, 36, and 48 have been amended.

Before addressing the merits of the rejections based on prior art, a brief description of the present application is provided. The present invention is directed to a system and method for supplanting the display of a dialog box (e.g., a Motif dialog box). The method and system of the present invention interposes a library 270 between a graphical interface 255 of an application 298 and an X-Toolkit Intrinsics ("Xt") library 260. The Xt library 260 is layered on top of an X-Window system 265 (and an operating system 295). Conventionally, in operation, the graphical interface 255 of the application 298 provides an original request or an original function call for an original function for displaying the dialog box. The Xt library 275 provides the original function for displaying the dialog box. The present invention, by contrast, uses the interposed library 270 layered between the graphical interface 255 and the Xt library 260 to intelligently intercept the function call from the graphical interface 255 of the application 298 via an interposed function of the interposed library 270. After intercepting the original function call, the interposed function intelligently determines (without notice of the application) whether the dialog box is to be supplanted.

For example, if the interposed function determines that the dialog box is to be supplanted by modifying the dialog box, the interposed function intelligently modifies a parameter in the intercepted function call, issues another (i.e., modified) function call to the Xt library 260 to display another or a modified dialog box with the modified parameter so that the modified dialog box, instead of the original dialog box requested by the application 298, is displayed by the application 298 (without notice of the application). Thus, the dialog box can be modified without having to modify the application 298 that uses the dialog box to interact with a user of the application 298. To put it another way, the user of the application 298 can now interface with the

application 298 via the modified dialog box provided by the present invention without any operation by or modification of the application 298.

Claims 1, 8-9, 16-17, 25-27, 36, and 48 have been amended to better clarify the subject matter being claimed and/or for consistency purposes.

The Examiner rejected Claims 1, 6, 9, 14, 17, 22, 27, 32, 36-39, 41-43, 46, 48-51, 53, 54, 55, 58 (i.e., all the independent claims and certain dependent claims) under 35 U.S.C. § 102(b) as anticipated by Stucka. Claims 2, 3, 10, 11, 18, 19, 28, 29 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Stucka in view of Jones. Claims 4, 5, 7, 8, 12, 13, 15, 16, 20, 21, 23, 24, 30, 31, 33-35, 44, 45, 47, 56, 57, 59 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Stucka in view of Parker. Claims 40 and 52 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Stucka in view of Kacur. These rejections are respectfully traversed.

Stucka is directed to a system and method for sharing a single Widget set 67, a single set of Xt Intrinsics 68, and a single Xlib interface 69 with a plurality of applications 50, 53, 54 via a user interface server (UIS) 48 and a UIS interface 52. The UIS 48 and UIS interface 52 disclosed in Stucka are simply dumb connection points or conduits that connect the plurality of applications 50, 53, 54 to a plurality of Xt components 67, 68, 69. Stucka also discloses that its UIS and UIS interface 48, 52 can remain the same while the "X server dependent" components or Xt components have to change when a WMS other than the X-Window system is used. See Col. 23, lines 38-55.

Stucka does not, however, disclose or suggest that its dumb conduit 48, 52 have any intelligence to intercept a function call for a dialog box from an application and to determine whether the dialog box is to be **supplanted** as is disclosed in the present application and recited in Claim 1. Nevertheless, the Examiner asserts that "Determining whether the Motif dialog box is to be supplanted; and supplanting the Motif dialog box" is disclosed by Stucka in Col. 23, lines 38-45. The Applicant respectfully disagrees. That is, as stated above, Stucka only discloses that its UIS and UIS interface 48, 52 are a dumb conduit that allows a plurality of applications to use a

plurality of Xt components. In fact, by its teaching that its UIS and UIS interface 48, 52 can remain the same while the "X server dependent" components or Xt components have to change when a WMS other than X-Window system is used (see Col. 23, lines 38-55), Stucka actually teaches away from any motivation for providing its UIS and UIS interface 48, 52 with the intelligence to intercept a function call for a X-Window Motif dialog box from an application and to determine whether the Motif dialog box is to be **supplanted** as is disclosed in the present application and recited in Claim 1. That is, if the UIS and UIS interface 48, 52 were to be provided with the intelligence to determine which X-server dependent components (e.g., Motif dialog boxes) are to be supplanted, the UIS and UIS interface 48, 52 becomes X-server dependent and can not remain the same and would have to be replaced or changed (for the same reasons as the X-server dependent components have to be replaced or changed) when a WMS other than X-Window system is used.

Moreover, in order to expedite allowance, Claim 1 has been amended to further clarify the subject matter being claimed and also to incorporate the limitation originally set forth in Claim 5. The Examiner points out (in rejecting Claim 5 that Stucka "does not specifically show . . . modifying at least one parameter in the intercepted call; re-calling the display of the Motif dialog box with modified parameter; and displaying a modified Motif dialog box." It should be noted that the fact that Stucka only discloses a simple or dumb conduit is a reason why Stucka does not disclose and cannot teach "modifying at least one parameter in the intercepted call; re-calling the display of the Motif dialog box with modified parameter; and displaying a modified Motif dialog box" as the Examiner correctly points out.

To make up for this deficiency, the Examiner cited Parker. Parker is directed to an automated testing system for testing an application using a Graphical User Interface (GUI). Parker discloses that an application 300 via a GUI 307 is normally the one that creates, modifies, and destroys logical screen elements (LSEs). See Col. 10, lines 2-19. Parker then discloses that in its system, a test script 315 can also be used to

manipulate the LSEs for purpose of testing the GUI 307. However, to make sure that the test script 315 can properly communicate with the GUI 307 (that is designed to communication with application 300), a test tool is provided to change the communications from the test script 315 to the GUI 307 (and vice versa) to be consistent with the communications that the GUI 307 would normally expect (e.g., from the application 300 so that a window can "look like what the user [normally] sees on the screen"). See Col. 24, lines 10-25. Thus, unlike the present invention, which modifies a call from the application so that a modified dialog box is displayed instead of the actual dialog box call for by the application, Parker uses a test tool to change the test scripts (e.g., the test script 315) to make sure that it provides a window exactly the same as would be requested by the application. In fact, by its teaching of making sure that a window needs to appear the same as would be provided by an application, Parker actually teaches away from any modification of a dialog box so that it would appear not to be the same as would be provided directly from an application. Thus, any motivation to combine Parker and Stucka to reject the present claims could only come from the advantages taught and suggested in the present application. Thus, proper grounds for an obviousness rejection are absent with regard to the claims in the present application (i.e., hindsight reconstruction).

Similar limitations, which are neither disclosed nor suggested by the cited references, are present in amended independent Claims 9, 17, and 27.

In addition, with regard to amended independent Claim 36, the Applicant respectfully submits that Stucka and Parker fail to suggest or disclose a computing system programmed to supplant a **Motif dialog box**, the computing system comprising:

- an application including:
 - a graphical interface;

- an X-Window system;

- an Xt library layered on top the X-Window system, the Xt Library including **an original function for calling the Motif dialog box**; and

an interposed library interposed between the graphical interface and the Xt library, the interposed library including an interposed function for intercepting the function call for the Motif dialog box, determining whether the Motif dialog box is to be supplanted, and supplanting the Motif dialog box;

wherein supplanting the Motif dialog box includes:

modifying at least one parameter in the intercepted call;

re-calling the display of the Motif dialog box with the modified parameter; and

displaying a modified Motif dialog box.

(Emphasis in bold added.)

Similar limitations, which are neither disclosed nor suggested by Stucka and Parker, are present in amended independent Claim 48.

Accordingly, a prima facie case of obviousness has not been established because Stucka and Parker do not teach all the limitations of Claims 1, 9, 17, 27, 36, and 48. In addition, there is no motivation to combine Stucka conduit for sharing a Widget set and the test tool in Parker for testing an application using a GUI.

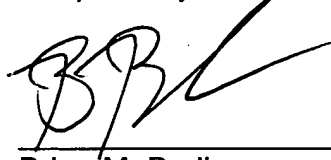
Claims 2-4, 6, and 8 depend (directly or indirectly) on Claim 1; Claims 10-12, 14, 16 depend on Claim 9; Claims 18-20, 22-23, and 25-26 depend on Claim 17; Claims 28-30 and 32-33 depend on Claim 27; Claims 37-44 and 46 depend on Claim 36; and Claims 49-56 and 58 depend on Claim 48. These dependent claims should be allowable for at least the reason that they depend on an allowable base. Further, a prima facie case of obviousness has not been established for Claims 2, 3, 10, 11, 18, 19, 28, 29, 40, 52 because, Stucka whether alone or in combination with Parker, when combined with Jones and/or Kacor still does not disclose each limitation of these claims.

Serial No. 09/865,287
April 2, 2004
Page 19

In view of the foregoing, the Applicant respectfully submits that Claims 1-4, 6, 8-12, 14, 16-20, 22-23, 25-30, 32-33, 36-44, 46, 48-56, and 58 are in condition for allowance. Reconsideration and withdrawal of the rejections is respectfully requested, and a timely Notice of Allowability is solicited. To the extent it would be helpful to placing this application in condition for allowance, the Applicant encourages the Examiner to contact the undersigned counsel and conduct a telephonic interview.

To the extent necessary, Applicant petitions the Commissioner for a one-month extension of time, extending to April 2, 2004, the period for response to the Office Action dated December 2, 2003. The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0639.

Respectfully submitted,



Brian M. Berliner
Attorney for Applicant
Registration No. 34,549

Date: April 2, 2004

O'MELVENY & MYERS LLP
400 South Hope Street
Los Angeles, CA 90071-2899
Telephone: (213) 430-6000